REMARKS

Claims 87-107 are pending in the application, of which Claims 87, 93 and 99 are independent. Claims 87 and 93-99 and have been amended to define still more clearly what Applicants regard as their invention. Favorable reconsideration is respectfully requested.

In the outstanding Office Action, Claim 87-107 were rejected under 35 U.S.C. § 103(a) as being obvious from U.S. Patent 6,351,320 B1 (Shin) in view of Applicants' admitted prior art.

Independent Claim 87 is directed to a computer program product, in which a computer readable medium stores a printer driver program for performing processing of image data to be transmitted to a printer. The program of Claim 87 comprises a database including plural process tables and a mode table which specifies a first process table and a second process table corresponding to a print mode. The program also comprises a program module for searching the mode table to find first and second process tables corresponding to a designated print mode. The program module is also for loading the found first process table and the second process table corresponding to the designated printing mode from the database.

Thus, the recited program module accesses the process tables to be utilized for performing processes based upon the designated print mode indirectly by virtue of the mode table. Accordingly, the program module and the process tables are separated. For example, a change to the addresses of the process tables does not automatically mean that corresponding changes to the program module are now required, because the program module does access the mode table, but does not access the process tables directly.

Shin has been adequately discussed in prior papers, and it is not believed to be necessary to repeat that discussion in full. Applicants note that that patent relates to color conversion using look-up table corresponding to the type of output medium to be used, but strongly believe that nothing found or pointed out in *Shin* would teach or suggest a database including plural process tables and a mode table which specifies a first process table and a second process table corresponding to a print mode, much less such a database in combination with the recited program module, which is for searching such a mode table to find first and second process tables corresponding to a designated print mode, loading such first process table and such second process table corresponding to the designated print mode from the database, and performing a first process and a second process using the loaded first and the second process tables, respectively.

The *Shin* apparatus contains mapping of N color correction lookup tables that are each for use with K different media types (K need not, and in general is not, the same for each of these LUTs), of which there are a total number M. A given one of the N color correction LUTs is used for K media types that have a common hue angle. Since N thus is less than M, there is a saving in the amount of memory required for the color correction tables. Applicants point out, however, that the mapping in the *Shin* apparatus is not performed dynamically. As shown in Fig. 3, one lookup table is generated for K media types, and the printer driver refers to the lookup tables directly without the use of an intervening or intermediate table.

Moreover, even if Fig 5 of *Shin* shows the use of LUTs and of gray component replacement ("GCR") tables (for undercolor removal), Applicants submit that each GCR table is determined according to media type indirectly using the LUT. This also does not suggest the recited database, or the recited program module.

Accordingly, Claim 87 is believed to be clearly allowable over *Shin*, taken alone. Moreover, even if the admitted prior art is deemed to include all that it is cited for, and assuming such could properly be combined with *Shin*, the result would not meet the terms of Claim 87.

Independent Claims 93 and 99 are method and computer (apparatus) claims respectively corresponding to program-product Claim 87, and are believed to be patentable for at least the same reasons as discussed above in connection with Claim 87.

A review of the other art of record has failed to reveal anything which, in Applicants' opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.
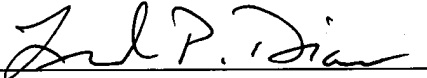
The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

This Amendment After Final Action is believed clearly to place this application in condition for allowance and its entry is therefore believed proper under 37 C.F.R. § 1.116. In any event, however, entry of this Amendment After Final Action, as an earnest effort to advance prosecution and reduce the number of issues, is respectfully requested. Should the Examiner believe that issues remain outstanding, he is respectfully requested to contact Applicants' undersigned attorney in an effort to resolve such issues and advance the case to issue.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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